



**Service of Process
Transmittal**

12/10/2020

CT Log Number 538722077

TO: Roland Lowell
Western Express, Inc.
2520 GRASSLAND SHRS
GALLATIN, TN 37066-5806

RE: Process Served in Virginia

FOR: WESTERN EXPRESS, INC. (Domestic State: TN)

ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

TITLE OF ACTION:	EMILY LYNN WILLIAMS, Pltf. vs. MICHAEL ALLEN CRADDOCK and WESTERN EXPRESS, INC., Dfts.
DOCUMENT(S) SERVED:	-
COURT/AGENCY:	None Specified Case # 197CL2000183500
NATURE OF ACTION:	Personal Injury - Vehicle Collision
ON WHOM PROCESS WAS SERVED:	National Registered Agents, Inc., Glen Allen, VA
DATE AND HOUR OF SERVICE:	By Process Server on 12/10/2020 at 09:33
JURISDICTION SERVED :	Virginia
APPEARANCE OR ANSWER DUE:	None Specified
ATTORNEY(S) / SENDER(S):	None Specified
ACTION ITEMS:	SOP Papers with Transmittal, via UPS Next Day Air , 1ZX212780111848086 Image SOP Email Notification, Roland Lowell rlowell@westernexp.com
REGISTERED AGENT ADDRESS:	National Registered Agents, Inc. 4701 Cox Road Suite 285 Glen Allen, VA 23060 866-539-8692 CorporationTeam@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

COMMONWEALTH OF VIRGINIA



WYTHE CIRCUIT COURT
Civil Division
225 S. FOURTH STREET
WYTHEVILLE VA 24382

Summons

To: WESTERN EXPRESS, INC
NATIONAL REGISTERED AGENT
4701 COX ROAD, STE. 301
GLEN ALLEN VA 23060

Case No. 197CL20001835-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Monday, December 07, 2020

Clerk of Court: JEREMIAH E MUSSER

by


(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: SYKES; BENJAMIN J

VIRGINIA:

IN THE CIRCUIT COURT FOR THE COUNTY OF WYTHE

EMILY LYNN WILLIAMS)

Plaintiff,)

v.)

Case No: CL

MICHAEL ALLEN CRADDOCK)

Serve: Secretary of the Commonwealth)

and)

WESTERN EXPRESS, INC.)

Serve: National Registered Agents, Inc.)

4701 Cox Road, Ste. 301)

Glen Allen, VA 23060)

Defendants.)

VALIDATE CASE PAPERS
RCPT : 20000010508
DATE : 12/07/2020 TIME: 10:20
CASE : 197CL20001835-00
ACCT : WILLIAMS, EMILY LYNN
AMT. : \$380.00

COMPLAINT

NOW COMES the plaintiff, Emily Lynn Williams, and moves for judgment against the defendants, Michael Allen Craddock and Western Express, Inc., jointly and severally, on the grounds and in the amount set forth below:

1. At all times pertaining hereto, defendant, Western Express, Inc., is a Tennessee corporation with its principal place of business in Nashville, Tennessee.

2. At all pertinent times herein, defendant Michael Allen Craddock, was the agent and employee of, and was acting as the agent and employee of the defendant, Western Express, Inc.

3. At all pertinent times herein, defendant Michael Allen Craddock, was the driver of the Tractor Trailer owned by defendant, Western Express, Inc.

4. On or about the 24th day of January, 2019, the plaintiff Emily Lynn Williams, was operating a Kia Forte vehicle on Route 610 in a northerly direction, at or



Colonnade Corporate Center
2965 Colonnade Drive, SW
Suite 225
Roanoke, Virginia 24018
Phone 540-989-0500
Fax 540-989-1888

near the intersection with the ramp to I-77, in the County of Wythe, in the Commonwealth of Virginia.

5. At that time and place, the defendant Michael Allen Craddock was operating a 2019 International Tractor Trailer, also traveling in a northerly direction on Route 610, at or near the intersection with the ramp to I-77, but in the left turn only lane designated solely for turning left onto the ramp to I-77, in the County of Wythe, in the Commonwealth of Virginia.

6. At that time and place, it was the duty of the defendant Michael Allen Craddock to operate the vehicle he was driving with reasonable care and with due regard for others using the road, including the plaintiff, Emily Lynn Williams.

7. Notwithstanding said duties, Michael Allen Craddock carelessly, recklessly, and negligently operated the vehicle he was driving so that it drove straight into the northbound lane of 610 from the left turn lane designated solely for turning left onto the ramp to I-77, and struck the side of plaintiff Emily Lynn Williams's vehicle, with great force and violence, pushing her vehicle down the roadway. Michael Allen Craddock was negligent, including he:

- (a) failed to keep a proper lookout;
- (b) failed to maintain proper control of his vehicle;
- (c) failed to pay full time and attention;
- (d) drove straight on using a lane designated for left turn only;
- (e) operated his vehicle at a speed unsafe for the conditions there apparent;
- (f) made an unsafe lane change;
- (g) drove from the left turn lane designated solely for turning onto I-77 into the northerly lane of Route 610 that was already occupied by the plaintiff's



Colonnade Corporate Center
2965 Colonnade Drive, SW
Suite 225
Roanoke, Virginia 24018
Phone 540-989-0500
Fax 540-989-1888

vehicle causing a collision with the plaintiff's vehicle and pushing it down the roadway.

8. As a direct and proximate result thereof, plaintiff, Emily Lynn Williams, sustained damages, including but not limited to serious and permanent injuries; has suffered and will continue to suffer great pain of body and mind; has sustained a loss of income and a loss of earning capacity; has sustained permanent disability; has incurred and will incur in the future, hospital, doctors' and related bills in an effort to be cured of said injuries.

9. Defendant, Western Express, Inc., is vicariously liable for the negligence and resulting damages caused by its agent and/or employee, defendant, Michael Allen Craddock.

WHEREFORE, the plaintiff, Emily Lynn Williams, demands judgment against the defendants, Michael Allen Craddock, and Western Express, Inc., jointly and severally, in the sum of **ONE MILLION SEVEN HUNDRED FIFTY THOUSAND DOLLARS (\$1,750,000.00)** plus interest and costs assessed as of the day of the accident referenced herein.

TRIAL BY JURY IS DEMANDED.

EMILY LYNN WILLIAMS

By:  of Counsel



Colonnade Corporate Center
2965 Colonnade Drive, SW
Suite 225
Roanoke, Virginia 24018
Phone 540-989-0500
Fax 540-989-1888

Benjamin J. Sykes, Esq., VSB#79127
SKOLROOD LAW FIRM PC
2965 Colonnade Drive, S.W., Ste. 225
Roanoke, VA 24018
Telephone (540) 989-0500
Facsimile (540) 989-1888
Email: bsykes@skolrood.com
Counsel for Plaintiff